

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GEORGE BOYD, et al.
*individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

LAW OFFICES OF SHAPIRO, BROWN, &
ALT, LLP, et al.,

Defendants.

Civil Action No. 3:12cv700

DECLARATION OF DAVID DAMIANI

I, David Damiani, am above the age of 18 years, am of sound mind and body, and I hereby state, under penalty of perjury, as follows:

1. I am a resident of Henrico County, Virginia.
2. I am work at a health systems company in Richmond. My typical work hours are 8-5, Monday through Friday. Although I am able to take leave from work, it would be difficult for me to get enough time off of work to travel to the Norfolk Division in order to litigate my case.
3. The property that I owned and forms the basis for this lawsuit against the Defendants is located at 2021 Stonequarter Road, Richmond Virginia 23233, which is located in Henrico County and the Richmond Division of the Eastern District of Virginia.
4. If this case were to be transferred to the Norfolk Division, it would cause significant hardships and inconveniences for me. Not only is the Norfolk Division about two hours away from my home and job, but it would be difficult for me to take enough time off of work in order to travel to the Norfolk Division.
5. I own a dog. As my wife travels almost every week for work, I am often the only person in our family that is able to care for our pet. If I had to travel to the Norfolk Division, I would have to board my dog, as there is no one else to care for him.
6. I also intend to call several witnesses located in the Richmond Division to support my case against the Defendants.
7. For example, I intend to offer the testimony of my wife, Rebecca Damiani. My wife knows about the material facts relevant to my foreclosure, including our attempts to obtain a



modification, our attempts to contact the Defendants to remain in our home, and the damages that we suffered when we ultimately lost our home. My wife lives with me in Henrico County, Virginia. She travels almost every week for work, often times outside of the country. It would be extremely difficult for her to take enough leave to travel to the Norfolk Division.

8. I also intend to seek the testimony of a Loan Processing Services representative to support my claims. LPS has an office in the Richmond Division of the Eastern District of Virginia at 5640 Cox Road, Glen Allen, Virginia 23060.

9. Additionally, many of the documents pertaining to my foreclosure are located in the Richmond Division, including the land records pertaining to my foreclosure, which are located at the Henrico County Circuit Court.

10. It is my preference that my case be litigated in the Richmond Division, as it is far more convenient for me.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.

Dated: 1/25/2013


DAVID DAMIANI